

# Exhibit 62

## **NTP Talc Review Status**

- February 26, 2002 -

### **1. NTP MAY RE-NEW TALC REVIEW 3-4<sup>TH</sup> Qtr. - 2002**

### **2. CRITICAL ISSUES**

- I. Mineralogy of cosmetic talc – pre 1976
- II. Admissibility of 16 Epidemiology studies – 14 of which yielded a positive association
- IV. Definitions of “Asbestiform Talc”

### **3. RECOMMENDED STRATEGIES**

- I. ***Pre-emptive*** literature review & analyses
  - i. Comprehensive literature search
    - a. Talc mineralogy (**Done**)
    - b. Ovarian/asbestos associations (**Done**)
    - c. Systemic distribution studies (**In-progress**)
  - ii. “White Papers/Critical analyses” to NTP
    - a. Industry/Trade Associations (**In-progress**)
    - b. Consultants – CRE, Dr. Wehner, Addison (**In-progress**)
    - c. Individual Companies (with “Standing”) .i.e., Luzenac America, R. T. Vanderbilt
- II. Roundtable discussions with NTP & other agencies
  - i. Review updated literature analyses
  - ii. Discuss NTP issues and concerns
  - iii. Suggested new area’s for research and study
- III. CRE “**Data Quality Analysis**” of existing talc scientific literature
  - i. CRE formal review based on new legislation and Office of Management & Budget (OMB) Guidelines\*. (Serves Notice to NTP).
  - ii. Renewal of CRE website activity of talc issues

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**\*CRE Requests Withdrawal Of The National Assessment On Climate Change On Data Quality Act Grounds** On February 11th, CRE requested that the United States Global Change Research Program and the Office of Science and Technology withdraw the First National Assessment on Global Climate Change because it violates the objectivity, utility and reproducibility requirements of the Data Quality Act and OMB's guidelines implementing the Act. More specifically, the National Assessment violates the Act and OMB's guidelines.

## **Litigation Issues**

- February 26, 2002 -

### **General Stages of a Civil Complaint – United States**

#### **1. SERVICE OF THE COMPLAINT**

- I. Engage Counsel Licensed in State
- II. File Formal Response to all Charges with Court

#### **2. DISCOVERY PROCESS**

- I. Interrogatories
- II. Request for Documents
- III. Depositions
- IV. Expert Witness Designation & Reports
- V. Request for Admissions
- VI. Pre-trial Conference
- VII. Arbitration/Mediation

#### **3. CIVIL TRIAL**

- I. Opening Statements
- II. Case-in-Chief - (Plaintiff presents evidence)
- III. Defense - (Defendant presents evidence)
- IV. Rebuttal - (Plaintiff may have option to call rebuttal witnesses)
- V. Closing Arguments
- VI. Jury Deliberates - Renders Decision

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### **Current Case Status for Luzenac America**

- **5 silicosis cases in Texas.** In 2 cases, records show sales of Luzenac talc and chlorite to facility where plaintiff alleges exposure.
- **1 asbestos/silica/talc case in New York.** Records show sales of Windsor unfloated talc to Bondo (body patch).
- **1 asbestos case in Maryland.** Records show sales of Yellowstone talc to facility where plaintiff alleges exposure.
- **1 asbestos case in California.** Rio Tinto companies named in suit. No record of talc usage or exposure. Plaintiff has died and case is being re-served as a wrongful death case.